

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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In re: Lindell Management LLC Litigation

Case No. 23-cv-1433 (JRT/DJF)

**ROBERT ZEIDMAN'S  
MEMORANDUM IN SUPPORT OF  
MOTION TO COMPEL  
RESPONSES TO REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

Pursuant to this Court's July 17, 2024 Order (ECF 85), Robert Zeidman asks this Court for another order compelling Lindell Management LLC ("Lindell) to comply with the Court's order and to respond, in writing, to Mr. Zeidman's post-judgment requests for production of documents.

On July 17, 2024, after a hearing on Mr. Zeidman's first motion to compel (ECF 62)<sup>1</sup>, this Court ordered Lindell to respond, in writing, to Mr. Zeidman's interrogatories and requests for production of documents by July 31, 2024. (ECF 85). On August 1, 2024, Mr. Zeidman received written responses to interrogatories. However, as of the date of this filing, Mr. Zeidman has not received written responses to his requests for production of documents.

(Declaration of C. Joshi ¶2). Counsel for Mr. Zeidman contacted counsel for

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<sup>1</sup> Mr. Zeidman incorporates by reference the motion and the memorandum in support of his first motion to compel (ECF 52 and 64), which sets forth the factual basis for his first request for an order compelling written responses to his discovery requests.

Lindell, Tom Miller, and inquired about the late responses. (Joshi Decl. ¶3). Mr. Miller responded that “We are targeting Friday for this....” (Joshi Decl. ¶4). Friday, August 9, is nine days after the Court’s ordered deadline.

While it may seem that Mr. Zeidman is being impatient by filing this motion and should simply wait until Friday, past experience has shown that Lindell has failed, time and again, to meet deadlines agreed to by the parties, deadlines required under the Federal Rules of Civil Procedure and, most egregiously, deadlines ordered by the Court. (ECF 64 and ECF 85). The only way to keep things moving forward, and keep a record of the obstacles Mr. Zeidman has faced trying to get information from Lindell, is to request this assistance from the court.

## I. CONCLUSION

Mr. Zeidman respectfully requests that the Court order Lindell Management LLC to respond immediately, in writing, to his February 22, 2024 requests for production.

DATED: August 8, 2024

**BAILEY & GLASSER LLP**

By: /s/ Cary Joshi  
Brian A. Glasser (admitted *pro hac vice*)  
Cary Joshi (admitted *pro hac vice*)  
1055 Thomas Jefferson St, Suite 540  
Washington, DC 20007  
T: (202) 463-2101  
F: (202) 463-2103  
[bglasser@baileyglasser.com](mailto:bglasser@baileyglasser.com)  
[cjoshi@baileyglasser.com](mailto:cjoshi@baileyglasser.com)

David E. Schlesinger (MN#  
0387009)  
4700 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
T: 612-256-3277  
F: 612-338-4878  
[schlesinger@nka.com](mailto:schlesinger@nka.com)  
*Attorneys for Robert Zeidman*